

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Rewel F. Viera-Martinez, employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), United States Department of Justice, having been duly sworn, do hereby depose and state as follows:

AGENT BACKGROUND

1. I have been employed as a Special Agent of the Bureau of ATF with the United States Department of Justice since September 2023. I am a graduate of the Federal Law Enforcement Training Center’s criminal investigator training program as well as the ATF National Academy, where I received more than 1080 hours of training, including but not limited to firearms ID and handling, executing warrants, defensive tactics, interview techniques, surveillance techniques, undercover operations, investigation techniques, and others.
2. Prior to my employment with ATF, I was a U.S. Border Patrol Agent under the United States Customs and Border Protection for two (2) years in Eagle Pass, Texas. My duties included enforcing immigration law by patrolling between ports of entry, conducting immigration inspections, responding to sensor activations, interdicting narcotics and human trafficking, and processing non-citizens, among other things. I also received medical training and was a certified EMT for the U.S. Border Patrol.
3. Through training, investigations, and experience, I have taken part in cases relating to the trafficking of firearms, the illegal possession of firearms, and the use of firearms in violent crimes by individuals and Drug Trafficking Organizations.
4. The information set forth herein is based on my personal knowledge, information obtained through interviews, the information provided to me by other law enforcement officers, and through other various forms of information. This affidavit is offered for the limited purpose of establishing probable cause that **Kris Joniel ROMAN-GONZALEZ** (“ROMAN-GONZALEZ”) violated 21 U.S.C. §§ 841(a)(1), 18 U.S.C. §§ 922(o), 924(c)(a)(A)(i) and 924(c)(1)(B)(ii). Therefore, I have not recited every fact known to me as a result of this investigation.
5. I am familiar with the information contained in this Affidavit, either through personal investigation or through discussions with other law enforcement officers who obtained information through investigation and surveillance, which they, in turn, reported to me.

This includes interviews conducted with local and federal law enforcement, with victim(s) and suspect(s).

FACTS THAT ESTABLISH PROBABLE CAUSE

6. On July 16, 2025, at approximately 4:40 pm, Agents from the Puerto Rico Police Bureau (PRPB) assigned to the Carolina Intelligence Division were conducting surveillance in Residencial El Coral in Carolina, Puerto Rico.
7. PRPB Agents were conducting surveillance and observed one individual, later identified as ROMAN-GONZALEZ, Kris, in a known drug point area. ROMAN-GONZALEZ was observed grabbing items from a bag and doing a hand-to-hand transaction that, based on the agents' training and experience, they recognized as a drug transaction.
8. A PRPB agent exited the unmarked unit and was able to get close to ROMAN-GONZALEZ since he was wearing civilian attire. Upon approaching ROMAN-GONZALEZ, the agent identified himself as a police officer. ROMAN-GONZALEZ turned around and started running away from the agent.
9. Agents engaged in a foot pursuit of ROMAN-GONZALEZ, maintaining eye contact with ROMAN-GONZALEZ at all times, observing when he threw a green fanny pack while continuing to flee. A PRPB agent was able to apprehend ROMAN-GONZALEZ, placing him under arrest.
10. Since the agents were in close proximity to ROMAN-GONZALEZ during the foot pursuit, one of them was able to immediately pick up and secure the green fanny pack that ROMAN-GONZALEZ had thrown. PRPB Agents inspected the fanny pack and found a firearm loaded with one magazine and another magazine partially filled. PRPB Agent stated that Miranda warnings were recited verbally to ROMAN-GONZALEZ.
11. Incident to the arrest of ROMAN-GONZALEZ, the following items were seized:
 - One (1) Glock 19, 9mm caliber, pistol, bearing serial number BCSM366 on the frame and SGY068 on the slide, loaded with one round in the chamber, and with an attached light gray-colored machine gun conversion device;
 - approximately twenty-nine (29) rounds of 9mm ammunition;
 - approximately two (2) 9mm caliber magazines,
 - one (1) red iPhone;
 - approximately forty-three (43) clear plastic baggies containing a white powdery

substance that field tested positive for cocaine and fentanyl;

- approximately one hundred and twenty-nine (129) clear cylindrical tubes containing a white powdery substance that field tested positive for crack and fentanyl;
- approximately nine (9) clear plastic baggies containing a green leafy substance that field tested positive for marijuana and fentanyl;
- approximately fourteen (14) containers with a green leafy substance that field tested positive for marijuana and fentanyl;
- approximately ten (10) small aluminum foils that field tested positive for heroin and fentanyl,
- drug paraphernalia; and
- one clear bag containing four (4) pink in color pharmaceutical pills.

12. On July 16, 2025, at approximately 5:30 p.m., the PRPB Agents requested assistance from the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) for possible federal prosecution.
13. ATF Personnel traveled to the PRPB Carolina precinct and were received by the Carolina Intelligence Division. ATF Personnel proceeded to read ROMAN-GONZALEZ his Miranda rights, which he understood and waived.
14. ROMAN-GONZALEZ stated, in summary and not verbatim, that he had been caught by police while selling drugs. Regarding the firearm, he indicated that he bought it for about nine hundred dollars (\$900) and that he knew it was “chipetia” slang to describe a firearm that has been converted into a machinegun). He bought it that way.
15. ROMAN-GONZALEZ stated he bought the firearm on the streets with the money he makes while selling drugs. ROMAN-GONZALEZ stated he works at a drug point in the Residential el Coral, and he usually makes about one or two dollars per item he sells. ROMAN-GONZALEZ also said that “today” (July 16, 2025) he was selling “perico” (slang for cocaine), marijuana, crack, and heroin with fentanyl.
16. An examination of the seized Glock 19 pistol and a preliminary field test without ammunition indicated that the firearm is likely able to fire more than a single round of ammunition per single function of the trigger, which would meet the legal definition of a machinegun. The firearm had a metal backing plate, clearly visible to the naked eye or

anyone handling the firearm, which allows the firearm to fire more than a single round of ammunition per trigger function. This is not the standard backing plate for the Glock 19, 9mm caliber pistol.

17. A picture of the items seized is as follows:



18. Based on the above facts, the undersigned affiant believes there is probable cause to charge **ROMAN-GONZALEZ, Kris** ("ROMAN-GONZALEZ") with violations of 21 U.S.C. §§ 841(a)(1), 18 U.S.C. §§ 922(o), 924(c)(a)(A)(i) and 924(c)(1)(B)(ii).

Respectfully submitted,

Rewel F. Viera Martinez
Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn by telephone pursuant to the requirements of Fed. R. Crim. P. 4.1 by at 12:14 PM on
July 17, 2025.

Marshal D. Morgan
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF PUERTO RICO